

## UNITED STATES DISTRICT COURT

for the

Western District of Texas**FILED**

October 04, 2024

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

United States of America

v.

Isaac Israel Martinez-Mendez (1)

Alicia Dominguez Garcia (2)

Defendant(s)BY: AC  
DEPUTYCase No. SA-24-MJ **-1390****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 3, 2024 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

21 U.S.C. § 841(b)(1)(A)

Possession with Intent to Distribute 500 Grams or More of a Mixture of  
Substance Containing a Detectable Amount of Methamphetamine.Penalties: 10 Years to Life Imprisonment, \$10 Million Fine, Minimum 5  
Years Supervised Release, and \$100 Mandatory Special Assessment.

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.*Complainant's signature*

Brian White, SAPD/HIDTA

*Printed name and title*

- ☐ Sworn to before me and signed in my presence.  
☒ Sworn to telephonically and signed electronically.

Date: October 4, 2024*Judge's signature*City and state: San Antonio, Texas

RICHARD B. FARRER, US MAGISTRATE JUDGE

*Printed name and title*

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Brian White, being duly sworn do hereby depose and state:

1. Your Affiant, Brian White, has been employed as a police officer for the San Antonio Police Department for over 30 years. The Affiant is currently assigned to the SAPD High Intensity Drug Trafficking Area detail conducting mid-level and above narcotic investigations to identify, arrest and indict individuals along with their accomplices operating drug trafficking organizations operating in and around the city of San Antonio along with the Western District of Texas.
2. As part of an ongoing investigation, law enforcement identified a residence on the 700 block of Fitch Street, San Antonio, Texas as a stash location for a drug trafficking organization. On October 3, 2024, investigators established surveillance at the location. During surveillance, Isaac Israel MARTINEZ-Mendez exited the residence while carrying a light green box and entered a dark grey Chevrolet Blazer. Soon after, a uniformed patrol officer stopped MARTINEZ-Mendez for a traffic violation at the 300 block of Stonewall. During the stop, MARTINEZ-Mendez admitted to having methamphetamine in the vehicle. A K9 on scene also alerted to the odor of narcotics coming from within the vehicle after which MARTINEZ-Mendez stated that there were two kilograms of methamphetamine in the vehicle. Law enforcement searched the vehicle and found about 2,015 grams of methamphetamine.
3. Next, your affiant obtained a search warrant for the residence on the 700 block of Fitch Street. Upon executing the warrant, investigators encountered three adults, including Alicia Dominguez GARCIA, and two children. During the search, investigators found about 36,553 grams of methamphetamine and 1,049 grams of cocaine in the master bedroom closet, which belongs to MARTINEZ-Mendez and GARCIA. Investigators found United States Currency throughout the residence with the majority being in the same master bedroom closet (\$23,350) in one black overnight kit. Also in the closet was a ledger that also contained \$2,400 in United States Currency. A total of \$27,280 in United States Currency was recovered from the residence.
4. During this investigation, investigators have observed GARCIA delivering narcotics and collecting narcotics proceeds. In a post-Miranda interview, GARCIA admitted that she resided in the master bedroom and that she believed the narcotics came from Mexico. GARCIA also stated that the narcotics in the closet belonged to MARTINEZ-Mendez.

5. Based on the above, there is probable cause that Isaac Israel MARTINEZ-Mendez and Alicia Dominguez GARCIA possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of 21 U.S.C. § 841(b)(1)(A).



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Brian White  
SAPD /HIDTA Narcotics

Sworn to telephonically and signed electronically on October 4th, 2024.



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Richard B. Farrer  
United States Magistrate Judge